

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:12CR115
)	
Plaintiff,)	JUDGE NUGENT
)	
v.)	UNITED STATES OF AMERICA'S
)	NOTICE OF DISCOVERY
ERIC LAMONT GOOD,)	PRODUCTION PURSUANT TO
)	RULE 16 OF THE FEDERAL RULES
Defendant.)	OF CRIMINAL PROCEDURE
)	AND REQUEST FOR RECIPROCAL
)	DISCOVERY

Now comes the United States of America, by its counsel, Steven M. Dettelbach, United States Attorney, and Robert W. Kern and Chelsea Rice, Assistant U.S. Attorneys, and hereby gives notice that the copies of the following were produced to counsel for the defendant, pursuant to Rule 16 of the Federal Rules of Criminal Procedure on Wednesday, April 4, 2012, by mailing a copy, postage prepaid, to Attorney James M. Kersey, Suite 1350 Standard Building, 1370 Ontario Avenue, Cleveland, Ohio 44113:

1. A CD-R disk containing a copy of defendant's Internet website as it existed on April 26, 2007;
2. Consent to search premises dated 8/1/07 signed by defendant;
3. Stipulation regarding authenticity dated 1/26/09, pertaining to mirror image of defendant's computer hard drive seized on 8/1/07;
4. Copies of Homeland Security reports of investigation (ROIs) dated 3/16/07; 4/3/07; 5/11/07; 6/15/07; 6/18/07; 6/22/07; 7/30/07; 8/3/07; 9/21/07; 9/25/07; 10/02/07; 10/18/07; 10/26/07; 10/29/07; 02/02/09; 02/04/09; 3/15/12;
5. Photograph of modification chip purchased from defendant dated 4/3/07;
6. Letter of review of modification chip from ESA dated 5/24/07;
7. Nintendo expert report concerning analysis of evidence;
8. Homeland Security SEACATS evidence inventory reports (4 reports);
9. Copy of search warrant (w/o affidavit or attachments) including inventory return.

A current NCIC report for defendant has been requested from Homeland Security and will be provided to defense counsel as soon as it is received.

Additionally, the search warrant affidavit filed in support of the search warrant executed at defendant's residence on 8/1/07 was filed under seal in South Carolina. Counsel for the government has requested that the affidavit be unsealed. A copy of the search warrant affidavit and attachments will be provided to defense counsel as soon as the unsealing occurs.

REQUEST FOR RECIPROCAL DISCOVERY

Having complied with its obligations under Rule 16(a) of the Federal Rules of Criminal Procedure, the United States hereby requests that each defendant produce all information, documents or other evidence subject to disclosure by a defendant under Rule 16(b) of the Federal Rules of Criminal Procedure. This request should be considered a continuing request by the United States.

Respectfully submitted,

STEVEN M. DETTELBACH
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2012, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Robert W. Kern
Robert W. Kern
Assistant U.S. Attorney